

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Bankruptcy Case No. 23-21916-JCM</b>
Marvin Arturo Galeas and	)
Amber Anne Galeas,	)
<b>Debtors,</b>	) <b>Chapter 13</b>
<hr/>	)
	)
Marvin Arturo Galeas and	) <b>Hearing Date:</b> March 26, 2024 @ 1:30 p.m.
Amber Anne Galeas,	)
<b>Debtors,</b>	) <b>Responses Due:</b> March 7, 2024
<b>v.</b>	)
Forward Financing, LLC;	) <b>Related to Docket No. 47, 48</b>
American Builders & Contractors	)
Supply, Co. Inc.; and Ronda J.	)
Winnecour, Chapter 13 Trustee;	)
<b>Respondents.</b>	) <b>Document No.</b>

**STIPULATED CONSENT ORDER RESOLVING CONTESTED MATTER AS TO  
FORWARD FINANCING LLC**

**AND NOW**, come the Movants, Marvin and Amber Galeas, and Respondent, Forward Financing, LLC, by and through their attorneys, stipulate and agree to the following order resolving the *MOTION TO (A) DETERMINE SECURED STATUS, (B) AVOID JUDICIAL LIEN, AND (C) DISALLOW, OR IN THE ALTERNATIVE, OBJECT TO CLAIM* (ECF No. 47) as to Respondent, Forward Financing LLC:

## STIPULATIONS OF THE PARTIES

A. Marvin and Amber Galeas (the “Debtors”) filed a chapter 13 bankruptcy on September 11, 2023.

B. As part of the Debtors' bankruptcy estate is the real property located at 3083 Countryside Drive, Allison Park, PA 15101.

C. The Debtors asserted an exemption in the amount of \$55,800 pursuant to 11 U.S.C. § 522(d)(1).

D. The Debtors asserted that several liens encumber 3083 Countryside Drive, Allison Park, PA 15101.

E. Forward Financing LLC asserted a judicial lien in the amount of \$23,898.00 based on Proof of Claim No. 27.

F. The Parties have determined Forward Financing LLC's lien is unsecured.

G. In lieu of further litigation and to minimize costs and expenses, the Parties, upon the advice of counsel, have agreed to resolve the dispute regarding the secured status and exemption impaired of Forward Financing LLC's claim through this stipulated consent order.

### **CONSENT ORDER**

It is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

1. The Motion is **GRANTED** as set forth herein.
2. The Claim of **FORWARD FINANCING LLC** is an Allowed General Unsecured Claim in the amount set forth in its Proof of Claim. Its Claim shall be treated as an unsecured claim to be paid at the same rate as all other unsecured claims in this case.
3. Upon the successful completion of the Debtors' Chapter 13 bankruptcy, the judicial lien of **FORWARD FINANCING LLC** shall be stripped off from 3083 Countryside Drive, Allison Park, PA 15101.
4. **FORWARD FINANCING LLC** shall not be compelled to record a copy of this Order in any appropriate offices and/or dockets. However, the Debtors retain the right to file a Certified Copy of this Order in all appropriate offices and dockets, including but not limited to, the Court of Common Pleas of Allegheny County, Pennsylvania and the

United States District Court for the Western District of Pennsylvania to reflect to the release of the judicial lien.

5. Any and all claims against **Forward Financing LLC** under Chapter 5 of the Bankruptcy Code are waived and released.

6. The Bankruptcy Court shall retain jurisdiction over the interpretation and enforcement of this Order.

**CONSENTED TO BY:**

*On behalf of the Debtors*  
*Marvin Arturo and Amber Anne*  
*Galeas*

/s/ Andrew K. Pratt  
Andrew K. Pratt, Esq.  
PA ID. No. 328784

*On behalf of Creditor*  
*Forward Financing LLC*

/s/ Walter Weir, Jr.  
Walter Weir, Jr., Esq.  
PA ID No.23137

**By the Court,**

John C. Melaragno, Judge  
**United States Bankruptcy Court**